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# Minnesota Pollution Control Agency

March 19, 1996

Mr. Donald Madore, Acting Director  
Environmental Planning and Evaluation Department  
Environmental Services Division  
Metropolitan Council/Wastewater Services  
230 East Fifth Street  
St. Paul, Minnesota 55101-1633

RE: Notice of Compliance for the September 26, 1995 (PM Retest No. 1), and the September 27, 1995 (PM<sub>10</sub> Testing), Performance Tests (Test) on Incinerator No. 10 (Emission Point No. 6) Pursuant to Air Emission Permit No. 879-90-OT-3 (Permit) and the Notice on Noncompliance Letter, Dated August 30, 1995

Dear Mr. Madore:

The Air Quality Division (AQD) staff of the Minnesota Pollution Control Agency (MPCA) has reviewed the final test report (report) for the test conducted on the emission unit(s) referenced above at the Metropolitan Council Wastewater Services (Company) facility located in St. Paul, Minnesota.

AQD staff has determined that the report demonstrates the following under test conditions while combusting natural gas:

## SUMMARY OF PERFORMANCE TEST RESULTS

Emission Unit Tested	Limitation Basis	Pollutant and Emission Limit	Test Result	Compliance Status
Emission Point No. 6	Minn. R. 7011.1310 & 40 CFR pt. 60, subp. O	<b>Particulate Matter (PM):</b> 1.3 lbs/dry ton of sludge charged	0.48 lbs/ton dry sludge charged <sup>1</sup>	Compliance
	Special Condition II.A.(3) in permit	<b>PM<sub>10</sub>:</b> 1.2 lbs/dry ton of sludge charged	0.79 lbs/ton dry sludge charged <sup>2</sup>	Compliance

### SUMMARY OF PERFORMANCE TEST RESULTS

Emission Unit Tested	Limitation Basis	Pollutant and Emission Limit	Test Result	Compliance Status
Emission Point No. 6	Minn. R. 7011.1310 & 40 CFR pt. 60, subp. O	<b>Opacity:</b> Not to exhibit 20 percent opacity or greater	<u>During PM</u> - Maximum observed opacity reading was 5% and Highest 6-minute average was 2.5% <u>During PM<sub>10</sub></u> - Maximum observed opacity reading was 10% and Highest 6-minute average was 5%.	Compliance
	Not Applicable	<b>Carbon Monoxide:</b> Not Applicable	<u>During PM</u> - 226 ppm at 7% Oxygen <u>During PM<sub>10</sub></u> - 275 ppm at 7% Oxygen	Methodology Acceptable

<sup>1</sup> Particulate matter is reported as filterable plus organic condensibles. The test results, as reported, demonstrate compliance with both the state and the federal emission limits for particulate matter.

Note: Filterable plus organic condensible particulate matter is required to demonstrate compliance with the state emission limit. Only filterable particulate matter is required to demonstrate compliance with the federal emission limit.

<sup>2</sup> PM<sub>10</sub> particulate matter is reported as filterable plus organic and inorganic condensibles.

**In addition, please be advised of the following:**

1. The test was conducted under the operating conditions listed in the table below.

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Test Date	Average Process Feed Rate	Control Equipment Operation
9/27/95 (PM <sub>10</sub> )	2.45 dry ton/hr sludge charged	Average Afterburner Temperature: 1288 °F Pre-Cooler Water Flow Rate: 223-225 gpm Venturi Water Flow Rate: 215-216 gpm Venturi (range): 27.6-30.5 inches W.C. Sub-Cooler (range): 3.2-4.5 inches W.C. Sub-Cooler Water Flow Rate: 1473-1538 gpm Average Calculated Residence Time: 3.1 sec
9/26/95 (PM)	2.71 dry ton/hr sludge charged	Average Afterburner Temperature: 1269 °F Pre-Cooler Water Flow Rate: 225-226 gpm Venturi Water Flow Rate: 213-214 gpm Venturi (range): 27.2-29.4 inches W.C. Sub-Cooler (range): 3.1-6.1 inches W.C. Sub-Cooler Water Flow Rate: 1585-1610 gpm Average Calculated Residence Time: 3.2 sec

The Company has satisfied the conditions and requirements as stated in the revised Test Plan Approval Letter, dated August 11, 1995, and those contained in Minn. R. 7017.2025, subp. 3(D). The Company may not operate Emission Point No. 6 at a higher sludge feed rate than 3.75 dry tons per hour, as stated in Special Condition III, Item (a) of Air Emission Permit No. 879-90-OT-3, unless it conducts a performance test at a higher rate and AQD staff determine compliance at that rate and a permit has been issued to operate at that rate.

If you have questions or comments regarding the content of this letter, please contact me at (612)297-8301.

Your continued cooperation is appreciated.

Sincerely,



Craig Averman  
Performance Test Coordinator  
Compliance Determination Unit  
Compliance and Enforcement Section  
Air Quality Division

CA:lat

cc: Todd Biewen, AQD/CES  
Hans Peterson, AQD/CES  
AQD File No. 879